

1 BARRY J. PORTMAN
Federal Public Defender
2 ANGELA M. HANSEN
Assistant Federal Public Defender
3 160 West Santa Clara Street, Suite 575
San Jose, CA 95113
4 Telephone: (408) 291-7753
5 Counsel for Defendant WHITE

6
7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,) No. CR 06-00111-JF
12)
Plaintiff,)
13 v.) **STIPULATION AND [PROPOSED]**
14 JOHN WHITE,) **ORDER TO CONTINUE STATUS DATE**
15 Defendant.)
_____)

16
17 Assistant United States Attorney Carlos Singh and defendant, John White, through his
18 counsel, Assistant Federal Public Defender Angela M. Hansen, stipulate and agree that the status
19 date in the above-captioned matter, presently scheduled for July 26, 2006, at 9:00 a.m., should be
20 continued to September 20, 2006 at 9:00 a.m.

21 The offense charged involves conduct that allegedly occurred over 10 years ago. The
22 parties stipulate and agree that the status date should be continued because counsel for Mr. White
23 needs additional time to investigate this case and to collect old records that may be relevant to
24 Mr. White's defense and sentencing exposure. Additionally, the parties are currently conducting
25 plea negotiations. For these reasons, the parties stipulate and agree to continue the status date to
26 September 20, 2006.

The parties further stipulate and agree that under 18 U.S.C. §§ 3161(h)(8)(A) and (B)(iv),
the ends of justice served by the continuance requested outweigh the best interest of the

1 defendant and public in a speedy trial because the failure to grant such a continuance would
2 unreasonably deny Mr. White the time necessary for effective preparation, taking into account
3 the exercise of due diligence.

4
5 SO STIPULATED.

6
7 Dated: July 24, 2006

/s/

ANGELA M. HANSEN
Assistant Federal Public Defender

8
9
10 Dated: July 24, 2006

/s/

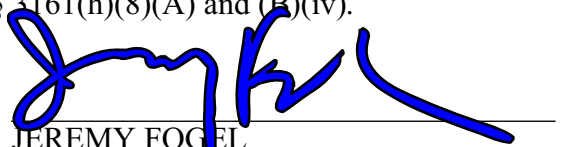
CARLOS SINGH
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 06-00111-JF
)	
Plaintiff,)	[PROPOSED] ORDER CONTINUING
)	STATUS DATE AND EXCLUDING
v.)	TIME
)	
JOHN WHITE,)	
)	
Defendant.)	
_____)	

The parties have jointly requested to continue the status date and good cause appearing, IT IS HEREBY ORDERED that the status date presently set for July 26, 2006 at 9:00 a.m. is continued to September 20, 2006 at 9:00 a.m. Pursuant to the parties' stipulation, IT IS FURTHER ORDERED that the period of time from July 26, 2006 through and including September 20, 2006, shall be excluded from the period of time within which trial must commence under the Speedy Trial Act, 18 U.S.C §§ 3161(h)(8)(A) and (B)(iv).

Dated: July 25 2006


JEREMY FOGEL
United States District Judge

1 Distribute to:

2 Angela Hansen
3 Assistant Federal Public Defender
160 West Santa Clara Street, Suite 575
4 San Jose, CA 95113
Counsel for Defendant

5 Carlos Singh
6 Assistant United States Attorney
150 Almaden Blvd., Suite 900
7 San Jose, CA 95113
Counsel for the United States